JUN 282

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604

REPLY TO ATTENT RCRA ACTIVI

Mr. R.E. Dunn Basf Wyandotte Corp. 1700 Blaney Drive Troy, Michigan 48084

RE: Interim Status Acknowledgement

USEPA ID No. MID057007478

FACILITY NAME: Basf Wyandotte Corp.

Dear Mr. Dunn: .

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely.

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosure

cc: Director Corp. Env. Protection

1173.						
1174.	LITY NAME					
1175.	DITI NAME				EPA ID NUMBER	
1176.						
	BASF WYANDOTTE CORP				MID057007478	
1177.						
1178.						
1179.	FACILITY OPERATOR					
1180.						
1181.	BASF WAYANDOTTE CORF					
1182.	THE MALABOUTE CORP					
1183.						
1184.	MACTY THE CLINE					
1185.	FACILITY OWNER					
1186.	BASE WAYANDOTTE CORP					
1187.						
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1189.	FACILITY LOCATION					
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SCHOOL BROOKEN



CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 533 373 889

January 24, 1986

REGEIVED

JAN 3 1 1986

U.S. EPA, Region V Hazardous Waste Management Permits Administration 230 South Dearborn Street Chicago, Illinois 60604

U.S. EPA, REGION V

Re: Notification of Hazardous Waste Activities BASF Corporation--Troy Works

EPA ID Number -- MID057007478

Part A

Gentlemen:

On 29 November, 1985 EPA issued rules and regulations regarding the burning of waste fuel and used oil fuel in boilers and industrial furnaces (50 FR 49164). Included in these regulations were revisions to the Hazardous Waste Activity Notification forms. For all affected facilities these forms are to be completed and submitted to EPA by 29 January 1986. It is not necessary to notify individual States, as this will be done by EPA.

BASF Corporation hereby submits the enclosed notification forms pursuant to these regulations. Please direct any questions concerning this correspondence to my attention.

Very truly yours.

A. D. Gillen

Manager

Environmental Affairs

/cir AG-3/J0B8-13

cc: L. A. Anderson

J. Saunders (2)

CONTINUE ON REVERSE

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C. COMMERCIAL CHEMICAL I	PRODUCT HAZAF	RDOUS WASTES. Enter	the four-digit number	from 40 CFR Part 261.3	33 for each chemical su	np-
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D. LISTED INFECTIOUS WAST	TES. Enter the fou	r—digit number from 40	CFR Part 261.34 for ea	ch listed hazardous waste	e from hospitals, veter	inary
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I certify under penalty of attached documents, and to I believe that the submitte	that based on my	v inquiry of those ind	lividuals immediately	responsible for obta	uning the informati	ion,

mitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

Keith Fry - Director

Corporate Environmental Affairs

DATE SIGNED

EPA Form 8700-12 (6-80) REVERSE

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

M

II D

C. Installation's EPA ID Number

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C. Commercial Chemical Product Hazardous Wastes. Emer t	he four-drait n	umber from 40	CFR Part 261.33	or each chen	nical substance				
your installation handles which may be a hazardous waste	Use additional	sheets if neces	sary. ,						
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D. Listed Infectious Wastes. Enter the four-digit number from ortals, or medical and research laboratories your installation	40 CFR Part 20 handles Use	61,34 for each f	s if necessary	rom hospitals	, veterinary hos-				
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E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in your installation handles. (See 40 CFR Parts 261.21 — 261.4	the boxes cor	responding to the	ne characteristics	of nonlisted t	hazardous wastes				
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		Title (type or pr		Deta S					
(Kei	ith Fry-I	Director-	Environmer	nta‡ //	20186				
Affairs-Chemical Division									

EPA Form 8700-12 (Rev. 11-85) Neverse

BASF Wyandotte Corporation



BECEIVED

100 Cherry Hill Road P.O. Box 181 Parsippany, N.J. 07054 201/263-5280

Keith Fry Director Corporate Environmental Protection

DEC 27 1985

SOLID WASTE BRAINCH U.S. EPA, REGION V

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P35 1210962

December 23, 1985

U.S. EPA Region V Hazardous Waste Management Permits Administration 230 South Dearborn Street Chicago, Illinois 60604

Gentlemen:

REGEIVED

DEC 3 0 1985

U.S. EPA, REGION V

Effective January 1, 1986, BASF Wyandotte Corporation will be merged into BASF Inmont Corporation, and simultaneously the name of the surviving corporation will be changed to BASF Corporation. This merger will not affect the ultimate ownership or operational control of BASF Wyandotte Corporation's Troy Works, 1700 Blaney Drive, Troy, Michigan, EPA ID Number MID057007478.

You are hereby requested to transfer all authorizations granted to this BASF Wyandotte Corporation facility to BASF Corporation. Also enclosed is a modified Hazardous Waste Activity Notification, which is submitted as a minor modification to the document previously filed to reflect this corporate name change.

Please direct any questions concerning this correspondence to the attention of Mr. Art Gillen at the above address.

Very truly yours

Keith Fry

/cir AG-2/J0B35-20

cc: L. A. Anderson

A. D. Gillen

J. Saunders (2)

PAC



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBÉR	•	MID057007478	REACKNOWLE	GEMENT
		BASE WYANDOTTE 1700 BLANEY DRI TROY	CORP VE Mi	48084
INSTALLATION ADDRESS		1700 BLANEY DRI	VE MI	48084

EPA Form 8700-12B (4-80)

10/03/81

Form Approved OMB No. 158-\$79016

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AUG 11 1980

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BASF Wyandotte Corporation



November 18, 1980

Permit Contact (SEPO)
U.S. Environmental Protection Agency
230 S. Dearborn Street
Chicago, Ill. 60604

Gentlemen:

Attached is the hazardous waste permit application for the Troy, Michigan facility of BASF Wyandotte Corporation.

Although we submitted the notification form by August 18, 1980, we have still not received an EPA ID number. Repeated telephone calls to your office were unanswered.

Kindly supply our identification number as soon as possible to permit us to properly dispose of our waste.

Very truly yours,

BASF Wyandotte Corp.

M.A. Wisniewski, P.E.

Manager, Corp. Env. Prot.

MAW/jsm

FORM	NVIRO	NMEN	TAL PRO	TECTION AGENCY	EPA I.D. NUMBER	4		100
	GENERAL INFORMATION Consolidated Permits Program							71.2 [14]
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	*****	4-9-4						医红霉
INSTRUCTIONS: Complete A through J to determ questions, you must submit this form and the suppl if the supplemental form is attached. If you answer is excluded from permit requirements; see Section C or	"no" h	o each struct	mateu III III	re parentnesis rollowing the question	. Mark "X" in the box in	the th	hird c	to any clumn ctivity
SPECIFIC QUESTIONS		ES NO				YES		FORM
A. Is this facility a publicly owned treatment which results in a discharge to waters of the L (FORM 2A)	U.S.?	2	10	B. Does or will this facility (either include a concentrated animal aquatic animal production facilities discharge to waters of the U.S.	If feeding operation or illity which results in a (FORM 2B)		х	ATTACHED
C. Is this a facility which currently results in discha to waters of the U.S. other than those describe A or B above? (FORM 2C)	ed in	2 23	ζ	D. Is this a proposed facility (oth in A or B above) which will	result in a discharge to	10	X	21
Does or will this facility treat, store, or dispos hazardous wastes? (FORM 3)	e of	X	X	waters of the U.S.? (FORM 2D F. Do you or will you inject at t municipal effluent below the taining, within one quarter	his facility industrial or owermost stratum con-	23	26 X	27
G. Do you or will you inject at this facility any produ- water or other fluids which are brought to the sur- in connection with conventional oil or natural gas duction, inject fluids used for enhanced recovery oil or natural gas, or inject fluids for storage of lic hydrocarbons? (FORM 4)	face pro- y of quid	X X		underground sources of drinkin H. Do you or will you inject at the cial processes such as mining process, solution mining of mation of fossil fuel, or recovery (FORM 4)	is facility fluids for spe- of sulfur by the Frasch	31	32 X	33
1. Is this facility a proposed stationary source which one of the 28 industrial categories listed in the structions and which will potentially emit 100 to per year of any air pollutant regulated under Clean Air Act and may affect or be located in attainment area? (FORM 5)	in- tons	X	36	J. Is this facility a proposed star NOT one of the 28 industrial instructions and which will po per year of any air pollutant re Air Act and may affect or be in area? (FORM 5)	categories listed in the tentially emit 250 tons	37	X	30
III. NAME OF FACILITY	29.74.76						-	Marine of
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IV. FACILITY CONTACT						59		
A. NAME & TITLE (las 2 D. I. R. E. C. T. O. R. P. E. N.	111		111	В. РНО!	E (area code & no.)			
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PA Form 3510-1 (6-80) NOV 1 9 198	80			89 41 42 47 - 91	CONTINI	15.01		

CONTINUED FROM THE FRONT	50
VII. SIC CODES (4-digit, in order of priority)	
A. FIRST	B. SECOND
c 7 2, 8, 2, 1 (specify) 7 7 15 16 - 19	(specify)
C. THIRD	D. FOURTH
7 (specify) C 7	(specify)
VIII. OPERATOR INFORMATION	
A. NAME	B. Is the name listed in Item VIII-A also the
	owner?
8 BASF Wyandotte Corp.	YES NO
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box;	
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE M = PUBLIC (other than federal or state) D S6 (specify)	A 2 0 1 2 6 3 3 4 0 0
E. STREET OR P.O. BOX	
P,O, B,O,X 181	35
F. CITY OR TOWN	G.STATE H. ZIP CODE IX, INDIAN LAND
BParsippany	N J 6 7 0 5 4 Is the facility located on Indian lands?
18 16 40	41 42 47 - 51
X. EXISTING ENVIRONMENTAL PERMITS	
A. NPDES (Discharges to Surface Water) D. PSD (Air Emissions from F	roposed Sources)
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B. UIC (Underground Injection of Fluids) E. OTHER (specific to the control of th	· · · · · · · · · · · · · · · · · · ·
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XI. MAP	
Attach to this application a topographic map of the area extending to at least the outline of the facility, the location of each of its existing and propose treatment, storage, or disposal facilities, and each well where it injects flu water bodies in the map area. See instructions for precise requirements.	d intake and discharge structures, each of its hazardous waste ds underground. Include all springs, rivers and other surface
	Fq: A/50
XII. NATURE OF BUSINESS (provide a brief description)	
Manufacture of polyether polyol resins an	d systems. F9: A
	51
All correspondence regarding this permit the Director, Corporate Environmental Pro P.O. Box 181, Parsippany, N.J. 07054	
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XIII. CERTIFICATION (see instructions)	
I certify under penalty of law that I have personally examined and am fami attachments and that, based on my inquiry of those persons immediatel application, I believe that the information is true, accurate and complete, false information, including the possibility of fine and imprisonment.	responsible for obtaining the information contained in the
A. NAME & OFFICIAL TITLE (type or print) B. SIGNATURE	C. DATE SIGNED
R.E. Dunn, Secretary	hung 11/17/20
COMMENTS FOR OFFICIAL USE ONLY	(1')
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PA Form 3510-1 (6-80) REVERSE	58

Please print or type in the unshaded a (fill—in areas are spaced for elite type	areas only e, i.e., 12 characters/ir	nch).	·				Form Approx	red OMB No.	158-58	0004	5	3
FORM	U.S. 'IR	ONMENTA	PERMI	TAPE	PLICAT	TION	I. EPA I.D.	NUMBER			τ/	A C
3 SEPA		onsolidated	l Permits Pro	gram			FMID	0570	107	4.7	8 3	1
FOR OFFICIAL USE ONLY	(This information	i is required	a under Sect	ion so	05 07 1101	(A.)	1 2			F-645	13 1 14	115
APPLICATION DATE RECEIVED APPROVED (yr., mo., & day)		Control of the Contro			cor	MMENTS		V				
							8 -					
II. FIRST OR REVISED APPLI	CATION											
Place an "X" in the appropriate box revised application. If this is your fir EPA I.D. Number in Item I above.	in A or B below <i>(mar.</i> st application and yo	<i>k one box</i> u already k	only) to ind know your fa	icate w acility's	hether thi EPA I.D.	s is the first ap Number, or i	oplication you f this is a revis	are submitti ed applicatio	ng for yo n, enter	our faci your fa	ility o	ra 's
A. FIRST APPLICATION (place	an "X" below and pr see instructions for de Complete item below.	finition of	appropriate ("existing" f	date) acility.	9		2.NEW FA		OR NE	WFAC	ILITI	
8 6 5 0 1 0 1 (use t	EXISTING FACILIT RATION BEGAN OR he boxes to the left)	IES, PROV	IDE THE D	ATE (yr., mo., & N COMMI	½ day) ENCED	YR. MO	DAY (PROVID yr., mo., rion be expect	& day)	OPE OR IS	RA-
B. REVISED APPLICATION (p		d complete	e Item I abo	ve)			2. FACILI		CRA PE	RMIT		
1. FACILITY HAS INTERI		TITIES	Salar Cale D				72					
III. PROCESSES — CODES AN A. PROCESS CODE — Enter the code			halow that	bost da	earibes es	oh process to l	ne used at the	facility Ten	lines are	provid	ded fo	r
PROCESS CODE — Enter the column entering codes. If more lines are describe the process (including its	needed enter the coo	le(s) in the	space provid	dea. IT	a process	will be used ti	hat is not inclu	ided in the li	st of cod	es belo	w,the	en
B. PROCESS DESIGN CAPACITY -	1									147		
UNIT OF MEASURE — For emeasure used. Only the units	ach amount entered i	n column I	B(1), enter t	he code	from the	list of unit m	easure codes b	elow that de	scribes tl	ne unit	of	
	PRO- APPROPRIA	ATE UNIT	SOF				PRO		PRIATE RE FOR			
	CESS MEASURE CODE DESIGN	FOR PRO		1.5.	PR	OCESS	CESS		IGN CA			
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CONTAINER (barrel, drum, etc.) TANK WASTE PILE	S01 GALLONS O S02 GALLONS O S03 CUBIC YARI	R LITERS				POUNDMENT		GALLON	S PER D	Y DAY OI		
SURFACE IMPOUNDMENT	S04 GALLONS O			INCI	NERATO	R	Т03	TONS PE METRIC	RHOUP	ROR	UR;	
Disposal:	D79 GALLONS O	PIITERS						GALLON LITERS I	SPERH	OUR	OR	
INJECTION WELL LANDFILL	D80 AERE-FEET would cover	(the volum one acre to	re that	therm	ial or biol	or physical, ch ogical treatme	nt	GALLON LITERS I			R	
A AND ADDITION	depth of one HECTARE-M D81 ACRES OR I	ETER		surfac	ce impoun	occurring in tar adments or inc the processes	iner-					
LAND APPLICATION OCEAN DISPOSAL	D82 GALLONS P LITERS PER	ER DAY O	R			ded; Item III-						
SURFACE IMPOUNDMENT	UNIT OF	R LITERS			UN	NIT OF				U	NIT O	F
AND OF MEACURE	MEASURE CODE	LINIT OF	MEASURE		ME	ASURE	UNIT OF	MEASURE			CODE	
UNIT OF MEASURE GALLONS	G	LITERSP	ER DAY			v	ACRE-FE	ЕТ			A	
CUBIC YARDS	Y	METRIC	R HOUR TONS PER I S PER HOU	HOUR.		W	ACRES	-METER			B	
GALLONS PER DAY	U	LITERS P	ER HOUR .	.2		н						
EXAMPLE FOR COMPLETING ITE other can hold 400 gallons. The faci	ility also has an incine	rator that	can burn up	to 20 g	gallons per	r hour.	rage tanks, one	tank can no	10 200 g	illolis e	and th	
S DUP	7/4 5	11	11	11	11	111	1 / / /	1//	11	1,	11	1
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IV. DES	SCRII	PTIO	ON OF HAZARDOUS WAST	FÇ		40				-ue-		esummuny Ag		4				ж			
A. EPA	HAZA	\RD0	OUS WASTE NUMBER - Enter	the for	JUT-	digit n	וטו	nber	rfro	m	40 CF	R, S	Subpart D	for each	listed ha	zardous	waste y	ou wil	ll hand	ile. If	vou
nancı	e naza	iraous	s wastes which are not listed in oxic contaminants of those hazard	40 CF1	H, 5	ubpari	t C), en	ter t	the	four-	digit	t number/	s) from 4	O CFR, S	ubpart C	that de	scribes	the cl	haracı	teris-
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pasis.	FOR 68	acn c	NNUAL QUANTITY — For each characteristic or toxic contaminan	nt enter	red i	ste ent in colu	ımı	n A	estir	mat	nn A e e the t	stim otal	annual q	iuantity o uantity o	of that wa fall the n	aste that on—listed	will be I waste	handii s) that	ed on a	an an e han	nual died
which	posse:	ess tha	at characteristic or contaminant.	:			: .						walisty i			Jana, je					
C. UNIT codes	OF M	IEAS	SURE - For each quantity enter	ed in c	olui	mn B	en:	ter t	.he ι	unit	of m	easu	re code. I	Units of a	measure w	hich mus	t be us	ed and	the ar	propi	riate
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		ales (Alex	NS				T		* 2** *		N	et:	RIC TON	s		• • • • • •		M			
If faci	ility re	cords	s use any other unit of measure opriate density or specific gravity	for qua	anti	ty, the	e u	ınits	of i	mea	asure n	nust	be conve	rted into	one of the	e required	d units	of mea	sure ta	aking	into
5 S. P.	পদুর্বি	analist.	Shirare deligity or sheeting Arearch	Orthe	. Wda	ste.															이상함
1. PR	ESSES ROCES	SS CO	DES:															New Year			
Fo to	r listed	d haz	zardous waste: For each listed how the waste will be stored, treate	iazardo	Jus v	vaste e	eni ~d	tered	l in	col	umn A	\ sel	ect the co	ode <i>(s)</i> fra	m the list	of proces	ss code:	s conta	ined in	n Item	n III
Fo	r non-	-liste	ed hazardous wastes: For each of	characte	erist	tic or t	toi	xic c	onta	ami	nant e	nter	ed in col	umn A, s	elect the	code(s) f	rom th	e list c	of proc	ess co	odes
tha	ntained at char	o in i	istic or toxic contaminant.	cesses ti	inat	will be	e L	used	to s	stor	re, trea	ıt, ar	nd/or disp	oose of a	ll the non	-listed h	azardo	us was	tes tha	at pos	ssess
No ex	rte: F	our r	spaces are provided for entering box of Item IV-D(1); and (3) En	j proce	355 C	odes.	If	mor	e ar	e n	eeded:	. (1)	Enter th	e first th	ree as des	cribed at	ove; (2	2) Ente	er "00	0" in	the
Section 1	444				14 (17)	Francisco.					an Bha Da	erikinia.	al solution and a	i kwa iliti waki	National Additional Re-	safér nadaman Ar					
file and the second	· . · · ·		SCRIPTION: If a code is not list		1.1	, gardan					Section .		the same of a			a ang Nababiya	a contratto	akan ba			
VOTE: I	HAZAI	RDOI	US WASTES DESCRIBED BY N Hazardous Waste Number shall be	AORE '	TH/	AN ON	۷E	EP/	A H	AZ	ARDO	US	WASTE I	NUMBEF	R — Hazar	dous was	tes tha	t can L	e desc	cribed	l by
1. Sei	lect on	ne of t	the EPA Hazardous Waste Numb	ers and	d ent	ter it ir	n c	colun	nn A	4. C	n the	sam	e line con	nplete col	lumns B,C	and D b	v estim	nating 1	the tot	al anr	nual
2. In	antity colum	or the in Ac	e waste and describing all the pro of the next line enter the other	cesses t	to b lazar	e used rdous \	itr	h tres	at c	tore	e and/	nr d	licance of	the weets	 USP (subject to the control of the con	of the supplied of	1000	State of the second		1.00	
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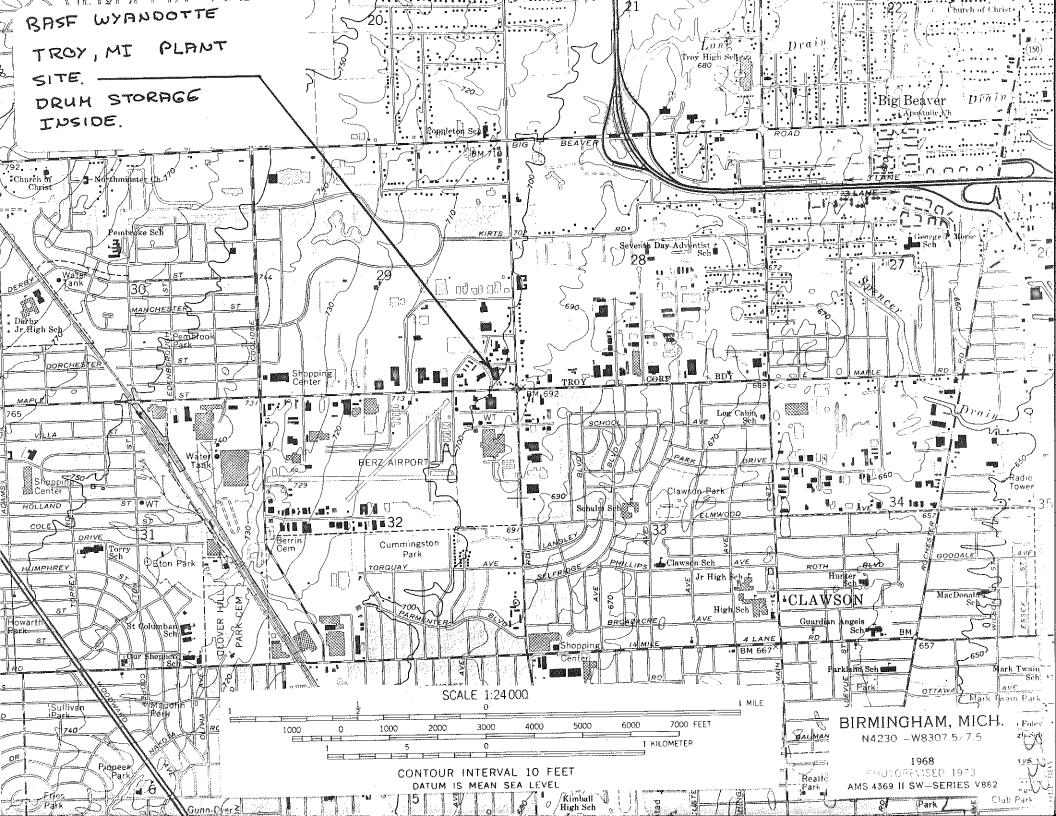
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IV. DESCRIPTION OF HAZARDOUS WAS	ROCESS CODES FROM ITE	FM D(1) ON P 3.		2 20
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FM1005700747836			11	
V. FACILITY DRAWING			其學是主义	
All existing facilities must include in the space prov	ided on page 5 a scale drawing of the	facility (see instructions	s for more detail).	6: A/55
VI. PHOTOGRAPHS All existing facilities must include photograp	be (easie) or ground level) that	clearly delineate all e	xistina structures: exis	ting storage. A
treatment and disposal areas; and sites of fut	ure storage, treatment or dispos	al areas (see instruction	ns for more detail).	F6: 56
	THE CONTRACT OF STREET STREET,			
VII. FACILITY GEOGRAPHIC LOCATION				
VII. FACILITY GEOGRAPHIC LOCATION LATITUDE (degrees, minutes, &	seconds)	LONGITUD	E (degrees, minutes, & se	conds)
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HE-12

APR 2 4 1987

Mr. Keith Fry BASF Corp. 1700 Blaney Drive Troy, MI 48084

EPA ID Number: MID-057-007-478

Re: Requirements for Generators, Marketers and Burners of Hazardous Waste and Used

Oil Fuels

Dear Mr. Fry:

This letter acknowledges that the United States Environmental Protection Agency (U.S. EPA) has received your Notification of Hazardous Waste Activity as required by the new Waste-As-Fuel regulations. These regulations were published in the November 29, 1985, Federal Register and apply to persons who generate, market, transport, or burn hazardous waste fuel or used oil fuel.

The following information highlights the administrative requirements for persons subject to the current Waste-As-Fuel regulations promulgated on November 29, 1985, in 40 CFR (Code of Federal Regulations) Part 266, Subparts D and E.

GENERATORS

Persons Generating Hazardous Waste Fuel. Generators that send their hazardous waste to a hazardous waste fuel marketer are subject to the 40 CFR Part 262 generator standards [see 40 CFR 266.32(a)]. Generators that market their hazardous waste fuel directly to burners are subject to both the 40 CFR Part 262 standards and the hazardous waste fuel marketer requirements [see 40 CFR 266.32(b)]. Generators that are burners are also subject to 40 CFR 266.35.

<u>Persons Generating Used Oil Fuel.</u> Used oil generators are exempt from the current Waste-As-Fuel regulations unless they: (1) market off-specification used oil fuel directly to a burner, or (2) burn off-specification used oil for energy recovery. Generators marketing directly to a burner are subject to 40 CFR 266.43. Generators burning off-specification used oil fuel are subject to 40 CFR 266.44.

MARKETERS

Persons Marketing Hazardous Waste Fuel. Persons who market hazardous waste fuel include the following: (1) generators marketing hazardous waste fuel directly to a burner, (2) persons who receive hazardous waste from generators and produce, process, or blend hazardous waste fuel, and (3) persons who distribute but do not process or blend hazardous waste fuel. Hazardous waste fuel marketers are required to have notified U.S. EPA of their hazardous waste fuel activities, have a U.S. EPA Identification Number, and market only to persons who have notified U.S. EPA and who burn the fuel only in industrial furnaces, industrial boilers, or utility boilers. These marketers are also required to comply with manifest requirements, certification of compliance with burning standards, recordkeeping requirements, and storage standards [see 40 CFR 266.34].

<u>Persons Marketing Used Oil Fuel.</u> 40 CFR 266.43 describes to whom the regulations for used oil marketing apply. The same requirements for persons marketing hazardous waste fuel apply to off-specification used oil fuel marketers, except for the manifest and storage requirements [see 40 CFR 266.43].

TRANSPORTERS

Persons Transporting Hazardous Waste Fuel. Persons who transport hazardous waste fuel are subject to the 40 CFR Part 263 standards for hazardous waste transporters. These persons are required to notify U.S. EPA of their Waste-As-Fuel activities. However, they are not required to renotify U.S. EPA of their hazardous waste transportation activities if they have already done so.

<u>Persons Transporting Used Oil Fuel.</u> Persons who transport used oil fuel, both onspecification and off-specification, are currently exempt from the Waste-As-Fuel regulations.

BURNERS

Persons Burning Hazardous Waste Fuel. Owners and Operators of industrial furnaces, industrial boilers and utility boilers that burn hazardous waste fuel are subject to the following: (1) notification to U.S. EPA of hazardous waste fuel activities, (2) manifest requirements, (3) certification with burner standards, (4) recordkeeping requirements, and (5) storage standards. Burners must also comply with the prohibitions on use in non-industrial boilers [see 40 CFR 266.35].

<u>Persons Burning Used Oil Fuel.</u> Owners and Operators of industrial furnaces, industrial boilers and utility boilers are subject to the same requirements as Hazardous Waste Fuel Burners except for the manifest and storage standards [see 40 CFR 266.44].

If you have any questions concerning this letter or the Waste-As-Fuel regulations, please contact either Ms. Shirlee Brauer at (312) 886-4591, or Ms. Laura Lodisio at (312) 886-7090 or the RCRA/Superfund Hotline at (800) 424-9436.

Sincerely,

Basil G. Constantelos, Director Waste Management Division

Enclosure

EPA Form 8700-13B(5-80) (Revised 11-83)

Page 1 of.

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983. Read All Instructions Carefully Before Making Any Entries on Form

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I. NON-REGULATED STATUS	Explain your non-regulated status in the space below.
See instructions before completing this section.	
This facility did not treat, store, or dispose of	
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ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

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BASF Wyandotte Corporation



100 Cherry Hill Road P.O. Box 181 Parsippany, N.J. 07054 201/263-5280

Certified Mail P35-1215190 Return Receipt

February 23, 1984

RCRA Activities EPA Region V PO Box A-3587 Chicago, IL 60690

Corporate Environmental Protection

Keith Fry

Director

Enclosed is the completed 1983 Facility Annual Hazardous Waste Report for BASF Wyandotte Corporation's Troy, Michigan Facility with EPA ID Number MID 057007478.

If there are any questions, please contact Ken Koneval at 201-263-5495.

Very truly yours,

Keith Fry

BASF WYANDOTTE CORPORATION

KCK/mjc
enclosure

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ENVIRONMENTAL PROTECTION A. . NCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983. Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS	Explain your non-regulated status in the space below.
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EPA Form 8700-13B(5-80) (Revised 11-83)

Print/Type Name

Keith Fry, Dir., Corp. Env. Prot.

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ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

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BASF Wyandotte Corporation



100 Cherry Hill Road P.O. Box 181 Parsippany, N.J. 07054 201/263-5280

Certified Mail P35 1210691 Return Receipt Requested

February 28, 1984

RCRA Activities EPA Region V PO Box A-3587

Chicago, IL 60690

Corporate Environmental Protection

Gentlemen:

Keith Fry

Director

Enclosed is the completed 1983 Facility Biennial Hazardous Waste Report for BASF Wyandotte Corporation's Troy, Michigan Facility with EPA ID Number MID 057007478.

If there are any questions, please contact Kenneth Koneval at 201-263-5495.

Very truly yours,

BASF WYANDOTTE CORPORATION

KCK/mjc enclosure